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7  
8 UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF WASHINGTON

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 MICHAEL VANTIGER,

14 Defendant.

Case No. 4:20-CR-6010-SAB

Declaration of Geana M. Van Dessel  
Re: Defendant's Motion to Suppress

1 Geana M. Van Dessel declares and states under penalty of perjury:

2 1. I am attorney for Defendant Michael Vantiger in this captioned matter  
3 and am authorized to make this declaration on his behalf. I am over the age of 18  
4 years and competent to testify to the matters stated in this Declaration, which I  
5 make on my personal knowledge and from my review of my firm's books and  
6 records in this captioned case, including the discovery produced by the  
7 Government.

8 2. I am filing this Declaration without the attachments below until I can  
9 confer with the United States about whether it wants the exhibits filed under seal.  
10 After the United States responds, the exhibits will be filed with the Court.

11 3. Attached to this Declaration as Exhibit A is a copy of the Declaration  
12 of Officer Andrew Corral for Search Warrant, Superior Court, Benton County  
13 Washington, Case NO. PPD 20-04193, for the rental vehicle in question – the 2019  
14 Chrysler 300 –which was produced in discovery by the United States at Bates Nos.  
15 10000188 – 10000206. The Search Warrant is dated February 10, 2020, and  
16 appears to be electronically signed but there is no signature from an issuing court  
17 or judge.

18 4. Attached as Exhibit B is a copy of the Pasco Police Department  
19 Inventory List from the search of the 2019 Chrysler 300, dated February 10, 2020,  
20 identified by Case #20-04193.

21 5. In Defendant's Motion to Suppress, Exhibit C is used to refer to the  
22 Dashcam Video from Detective Andrew Corral's Patrol Car on February 10, 2020.

Declaration of Geana M. Van Dessel Re:  
Motion to Suppress and Challenge K9 Alert - 1

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1 It was produced in discovery by the United States as an unscannable exhibit titled  
2 ‘AndrewCorralCar\_202002101459\_15215\_379386908’. It will be available to play  
3 at the evidentiary hearing, but if the Court wants to view it sooner, I will make it  
4 available.

5 6. In Defendant’s Motion to Suppress, Exhibit D is another unscannable  
6 exhibit, a true and accurate copy of the Body Cam Video from Detective Andrew  
7 Corral on February 10, 2020, titled ‘NARCOTICS’, which was produced in  
8 discovery by the United States.

9 7. In Defendant’s Motion to Suppress, Exhibit E refers to an  
10 unscannable exhibit, which is a true and accurate copy of Body Cam Video from  
11 Sargent Warren on February 10, 2020, titled ‘Narcotics-2’, produced in discovery  
12 by the United States.

13 8. Attached as Exhibit F is a true and accurate copy of Detective Andrew  
14 Corral and K9 Ezra Training Report– 1, covering dates January 23, 2020 through  
15 October 26, 2020, produced in discovery by the United States without a Bates  
16 number.

17 9. Attached as Exhibit G is a true and accurate copy of Det. Andrew  
18 Corral and K9 Ezra Training Report– 2, covering dates March 5, 2019 through  
19 December 26, 2019, produced in discovery by the United States without a Bates  
20 number.

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22  
Declaration of Geana M. Van Dessel Re:  
Motion to Suppress and Challenge K9 Alert - 2

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Declaration of Geana M. Van Dessel Re:  
Motion to Suppress and Challenge K9 Alert - 4

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**CERTIFICATE OF SERVICE**

I certify that on January 4, 2021, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF System which in turn automatically generated a Notice of Electronic Filing (NEF) to all parties in the case who are registered users of the CM/ECF system. The NEF specifically identifies recipients of electronic notice.

s/ Geana M. Van Dessel  
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Declaration of Geana M. Van Dessel Re:  
Motion to Suppress and Challenge K9 Alert - 5

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